## CARRILLO & CARRILLO

## LAW FIRM-ABOGADOS

Charlie Ezra Carrillo (NY)

VIA ECF

The Honorable Paul G. Gardephe Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

June 18, 2021

Memo Endorsed: The initial pretrial conference scheduled for June 24, 2021 is adjourned to October 14, 2021 at 9:45 a.m. The conference will take place by telephone.\*\*

United States District Judge

Dated: June 20, 2021

Paul 2. Londgete

Motion for Adjournment of Pretrial Conference

21-cv-01424 (PGG)

Re: Choto Pleitez v. Republic of El Salvador

Dear Judge Gardephe:

The undersigned counsel writes on behalf of the Plaintiffs to request an adjournment of the Pretrial Conference scheduled for June 24, 2021, at 10:30 AM.

Plaintiffs requested one previous adjournment of the Pretrial Conference to serve the summonses to the defendants located in El Salvador. That motion was approved on May 13, 2021. Plaintiff also filed an amended complaint on May 12, 2021, which removed one plaintiff from the complaint. The summons was issued by the Clerk of the Court on May 28, 2021. Plaintiffs sent the summons to each of the Defendants via FedEx on June 16, 2021. All of the summonses are scheduled to be delivered by June 23, 2021.

Because several of the Defendants are located in El Salvador, they will not be available for the June 24, 2021, Pretrial Conference. Since some of the Defendants are outside the United States, they have 90 days to respond to the complaint. FRCP 12 (a)(1)(A)(ii).

Plaintiffs' counsel respectfully requests Your Honor grant this motion and order an adjournment of the Pretrial Conference and reschedule it for a later date the Court determines to be appropriate to allow Defendants the opportunity to attend or respond to the complaint.

\*\*The parties are directed to dial 888-363-4749 to participate, and to enter the access code 6212642. The press and public may obtain access to the telephone conference by dialing the same number and using the same access code. The Court is holding multiple telephone conferences on this date. The parties should call in at the scheduled time and wait on the line for their case to be called. At that time, the Court will un-mute the parties' lines. Seven days before the conference, the parties must email

GardepheNYSDChambers@nysd.uscourts.gov with the phone numbers that the parties will be using to dial into the conference so that the Court knows which numbers to un-mute.

The email should include the case name and case number in the subject line.

**MARYLAND OFFICE 259 West Patrick Street** Frederick, MD 21701

Respectfully submitted,

Charlis Carrillo Charlie Carrillo, Esquire

**NEW YORK OFFICE 7621 13<sup>th</sup> Avenue** Brooklyn, NY 11228

PHONE: (301) 378-8595 | FAX: (240) 680-2762 | Email: cc@carrillobrux.com